

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a )  
HELLER HEALTHCARE FINANCE, )  
INC., )  
 )  
Plaintiff, )  
 )  
And )  
 )  
MICHAEL INGOLDSBY, )  
 )  
Intervenor/Plaintiff, )  
 )  
v. )  
 )  
NATIONAL UNION FIRE )  
INSURANCE COMPANY OF )  
PITTSBURGH, PA., and )  
INTERNATIONAL INSURANCE )  
GROUP, LTD., )  
 )  
Defendants. )

Civil Action No. 05-CV-11128-NG

**DEFENDANT NATIONAL UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA.’S MOTION FOR SUMMARY JUDGMENT  
AGAINST INTERVENOR-PLAINTIFF MICHAEL INGOLDSBY**

Defendant National Union Fire Insurance Company of Pittsburgh, PA.

(“NUFIC”) submits this Motion for Summary Judgment with respect to the claims asserted by Intervenor-Plaintiff Michael Ingoldsby (“Ingoldsby”) in his First Amended Complaint in Intervention (the “Intervenor Complaint”).

For the reasons set forth in the Memorandum of Law, filed herewith, this Court should grant NUFIC’s Motion for Summary Judgment.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: June 27, 2006

/s/ Joey H. Lee  
John D. Hughes (BBO# 243660)  
Mary Patricia Cormier (BBO# 635756)  
Joey H. Lee (BBO# 663803)  
EDWARDS ANGELL PALMER  
& DODGE LLP  
111 Huntington Avenue  
Boston, MA 02199  
Tel: (617) 239-0100  
Fax: (617) 227-4420